

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS

KIN-YIP CHUN, Individually and on Behalf	§	Civil Action No. 3:18-cv-01338-X
of All Others Similarly Situated,	§	
	§	<u>CLASS ACTION</u>
Plaintiff,	§	
	§	
vs.	§	
	§	
FLUOR CORPORATION, et al.,	§	
	§	
Defendants.	§	
	§	
_____	§	

**PLAINTIFFS' NOTICE OF MOTION AND MOTION TO SUPPLEMENT OR, IN THE
ALTERNATIVE, AMEND THE FIRST AMENDED CONSOLIDATED COMPLAINT
FOR VIOLATION OF THE FEDERAL SECURITIES LAWS**

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that Wayne County Employees' Retirement System, the Town of Fairfield Employees' Retirement Plan, and the Town of Fairfield Police and Firemen's Retirement Plan (together, "Lead Plaintiffs"), by and through their counsel, will and do hereby move this Court, pursuant to LR 7.1, for the entry of an Order granting their motion to supplement or, in the alternative, amend the First Amended Consolidated Complaint for Violation of the Federal Securities Laws. In support of their motion, Lead Plaintiffs respectfully submit herewith the accompanying Memorandum of Law and exhibits thereto and Proposed Order.

DATED: October 29, 2020

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/s/ Joe Kendall

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Local Counsel for the Town of Fairfield Employees'
Retirement Plan and the Town of Fairfield Police and
Firemen's Retirement Plan

CERTIFICATE OF SERVICE

This is to certify that on October 29, 2020, I have filed the above and foregoing on the Court's CM/ECF electronic filing system, and that by virtue of this filing, all attorneys of record will be served electronically with true and exact copies of this filing.

/s/ Joe Kendall

JOE KENDALL

CERTIFICATE OF CONFERENCE

Counsel for Lead Plaintiffs conferred via e-mail with counsel for Defendants on October 28, 2020 and October 29, 2020. Counsel for Defendants, having previously indicated their opposition to a second amendment (*see* ECF No. 121), indicated that they continue to oppose such amendment and do not consent to Lead Plaintiffs' motion.

/s/ Darryl J. Alvarado

DARRYL J. ALVARADO